

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHAUN STRICKLAND,	:	
	:	
Plaintiff,	:	Civil Action No: 21-4141
v.	:	
DELAWARE COUNTY, et al.,	:	Judge Michael M. Baylson
	:	
Defendants.	:	
	:	

**STIPULATION FOR EXTENSION OF TIME
PURSUANT TO LOCAL RULE 7.4(b)(2)**

Pursuant to Local Rule 7.4(b)(2), Plaintiff Shaun Strickland and Defendants Delaware County, Lee Tatum, GEO Group Inc., Kristen Grady, John Christakis, Ronald Phillips, and Jeff Withelder, hereby stipulate as follows:

1. The parties continue to engage in discussions regarding the exchange of written discovery.
2. The parties held a phone conference on this subject on October 19 and will continue exchanging written discovery throughout the month of October and early November.
3. Therefore, Plaintiff Strickland and Defendants Delaware County, Tatum, GEO Group, Grady, Christakis, Phillips, and Withelder agree that the following deadline is to be amended as follows:
 - a. The parties may file a motion to compel regarding Rule 33 and 34 by November 18, 2022.

So stipulated,

/s/ Sarah Bleiberg Bellos

Sarah Bleiberg Bellos
Su Ming Yeh
Pennsylvania Institutional Law Project
718 Arch Street, Suite 304S
Philadelphia, PA 19106
sbellos@pilp.org
smyeh@pilp.org

/s/ Matthew H. Fry

Matthew H. Fry
Burns White
1001 Conshohocken State Road, STE 1-515
West Conshohocken, PA 19428
mhfry@burnswhite.com

Dated: October 27, 2022

APPROVED BY THE COURT:

/s/ MICHAEL M. BAYLSON

MICHAEL M. BAYLSON, U.S.D.J.